

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

LAURA PREFONTAINE, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

RESEARCH IN MOTION LIMITED, BRIAN  
BIDULKA, JAMES L. BALSILLIE, AND MIHALIS  
“MICHAEL” LAZARIDIS,

Defendants.

Civil Action No. 11 Civ. 4068 (RJS)

NANCY A. DEMARKIS, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

RESEARCH IN MOTION LIMITED, BRIAN  
BIDULKA, JAMES L. BALSILLIE, AND MIHALIS  
“MICHAEL” LAZARIDIS,

Defendants.

Civil Action No. 11 Civ. 4560 (RJS)

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**THE RIM INVESTOR GROUP’S NOTICE OF MOTION FOR (1) CONSOLIDATION;  
(2) APPOINTMENT AS LEAD PLAINTIFF; AND (3) APPROVAL OF LEAD  
PLAINTIFF’S SELECTION OF LEAD COUNSEL**

MICHAEL MCNEAL and KENNETH GOLD,  
Individually and on Behalf of All Others Similarly  
Situated,

Plaintiffs,

v.

RESEARCH IN MOTION LIMITED, BRIAN  
BIDULKA, JAMES L. BALSILLIE and MIHALIS  
“MICHAEL” LAZARIDIS,

Defendants.

Civil Action No. 11 Civ. 5472 (RJS)

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, Plaintiffs Michael McNeal and Kenneth Gold (the “RIM Investor Group”) will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for entry of an Order: (1) consolidating all the above-captioned actions and any related actions that may be filed under Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing the RIM Investor Group as Lead Plaintiff in the consolidated actions; (3) approving the RIM Investor Group’s selection of Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (4) granting such other and further relief as the Court may deem just and proper.

This motion is based on this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Richard W. Gonnello filed herewith, the pleadings and other filings herein, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, the RIM Investor Group respectfully requests the Court to: (1) consolidate all the above-captioned actions and any related actions that may be filed; (2) appoint the RIM Investor Group as Lead Plaintiff pursuant to the PSLRA; (3) approve Faruqi & Faruqi, LLP as Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: August 12, 2011

Respectfully submitted,

**FARUQI & FARUQI, LLP**

/s/ Richard W. Gonnello  
Antonio Vozzolo  
Richard W. Gonnello  
369 Lexington Avenue  
New York, New York 10017  
Telephone: (212) 983-9330  
[avozollo@faruqilaw.com](mailto:avozollo@faruqilaw.com)  
[rgonnello@faruqilaw.com](mailto:rgonnello@faruqilaw.com)

Jacob A. Goldberg  
Sandra G. Smith  
101 Greenwood Avenue, Suite 600  
Jenkintown, PA 19046  
Tel: 215-277-5770  
Fax: 215-277-5771  
[jgoldberg@faruqilaw.com](mailto:jgoldberg@faruqilaw.com)  
[ssmith@faruqilaw.com](mailto:ssmith@faruqilaw.com)

*Attorneys for the RIM Investor Group*